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**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES**

CH₂O, Inc.

Plaintiff,

v.

MERAS ENGINEERING, INC.;
HOUWELING'S NURSERIES
OXNARD, INC; HNL
HOLDINGS LTD.;
HOUWELING UTAH
OPERATIONS, INC.; and
HOUWELING'S NURSERIES
LTD.,

Defendants.

CASE NO. CV 13-08418-JAK-GJSx

**CONSENT MOTION TO EXTEND PAGE
LIMITS FOR THE PARTIES'
RESPECTIVE SUMMARY JUDGMENT
BRIEFS**

**CONSENT MOTION TO EXTEND PAGE LIMITS FOR THE PARTIES' RESPECTIVE SUMMARY
JUDGMENT BRIEFS**

CASE NO. CV 13-08418-JAK-GJSx

1 Subject to the Court's approval, the parties hereby consent and stipulate to
2 this Motion to Extend Page Limits for the Parties' Respective Summary Judgment
3 Briefs and, pursuant to the Court's Standing Order for Civil Cases, 9d, seek to
4 extend the page limits for opening summary judgment briefs from 25 pages to 35
5 pages; the page limits for opposing summary judgment briefs from 25 pages to 35
6 pages; and the page limits for reply summary judgment briefs from 10 pages to 15
7 pages, all based upon the good cause set forth below.
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11 As the Court is aware, this is a case for patent infringement. Defendants are
12 defending by challenging both the validity of the patent-in-suit and the
13 infringement thereof. The validity will be challenged based on 35 U.S.C. §§ 102,
14 103, and 112. And while Defendants will limit their invalidity briefing to the
15 most persuasive arguments, such discussion will nonetheless entail a review of
16 numerous pieces of prior art. Similarly, Defendants anticipate a number of
17 arguments with respect to the non-infringement of the patent-in-suit, addressing
18 more than one of the required method claim limitations.
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22 Additionally, the parties have exchanged extensive technical expert reports
23 on issues pertaining to infringement and validity of the asserted patent. The
24 reports will need to be addressed in the moving and opposing papers.
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1 Accordingly, the parties are in agreement that an enlargement of the
2 standard page limits is justified by the circumstances of the case.
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4 DATED: February 8, 2016

STAINBROOK & STAINBROOK, LLP

5 /s/ Craig M. Stainbrook

6 By: _____

7 Craig M. Stainbrook

8 Attorneys for Defendants
9

10 DATED: February 8, 2016

FISH & RICHARDSON P.C.

11 /s/ Andrew R. Kopsidas

12 By: _____

13 Andrew R. Kopsidas

14 Attorneys for Plaintiff, CH2O, Inc.
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